



Eric Gonzalez
District Attorney

**DISTRICT ATTORNEY
KINGS COUNTY**

350 JAY STREET
BROOKLYN, NY 11201-2908
(718) 250-2000
WWW.BROOKLYNDA.ORG

[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: **FELICIA SIMON**

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

MOS SIMON WAS FOUND GUILTY AFTER DEPARTMENTAL TRIAL OF THE FOLLOWING CHARGES AND SPECIFICATIONS, ARISING FROM AN INCIDENT ON OR ABOUT FEBRUARY 2ND, 2006, WHILE ASSIGNED TO THE 67TH PRECINCT:

1. MOS SIMON, IN KINGS COUNTY, DID WRONGFULLY ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT IN THAT SHE PROVIDED AN ACTIVITY LOG CONTAINING A FALSE ENTRY TO AN INDIVIDUAL KNOWN TO THIS DEPARTMENT DURING AN OFFICIAL INTERVIEW.
2. MOS SIMON DID WRONGFULLY ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT IN THAT SHE PROVIDED AN ACTIVITY LOG CONTAINING FALSE ENTRY TO AN INDIVIDUAL KNOWN TO THIS DEPARTMENT DURING AN OFFICIAL INTERVIEW.

CASE CLOSED ON 12/14/2010

ACTION TAKEN: DISMISSAL PROBATION, FORFEITURE OF SEVENTEEN (17) DAYS SERVED ON PRE-TRIAL SUSPENSION, FORFEITURE OF TWENTY-THREE (23) VACATION DAYS, FOR A TOTAL FORFEITURE OF FORTY (40) VACATION DAYS

Disclosure # 2:

THE NYPD ENTERED A PLEA OF GUILTY AGAINST MOS SIMON FOR THE FOLLOWING DEPARTMENTAL CHARGES AND SPECIFICATIONS, ARISING FROM AN INCIDENT DATED ON OR ABOUT MAY 15TH, 2009, WHILE ASSIGNED TO THE 67TH PRECINCT AND ON DUTY:

1. MOS SIMON, HAVING BEEN ASSIGNED TO GUARD A HOSPITALIZED PRISONER KNOWN TO THE DEPARTMENT IN KINGS COUNTY HOSPITAL, KINGS COUNTY, DID FAIL TO KEEP SAID PRISONER UNDER CONSTANT OBSERVATION, RESULTING IN SAID PRISONERS ESCAPE
2. MOS SIMON, HAVING BEEN ASSIGNED TO GUARD A HOSPITALIZED PRISONER KNOWN TO THE DEPARTMENT IN KINGS COUNTY, HAVING BEEN INVOLVED IN AN UNUSUAL OCCURRENCE, DID THEREAFTER FAIL AND NEGLECT TO TIMELY REPORT SAID OCCURRENCE TO WIT: MOS SIMON DID FAIL AND NEGLECT TO TIMELY REPORT THE ESCAPE OF A HOSPITALIZED PRISONER

CASE CLOSED ON 12/14/2010

ACTION TAKEN: DISMISSAL PROBATION, FORFEITURE OF SEVENTEEN (17) DAYS SERVED ON PRE-TRIAL SUSPENSION, FORFEITURE OF TWENTY-THREE (23) VACATION DAYS, FOR A TOTAL FORFEITURE OF FORTY (40) VACATION DAYS

Disclosure # 3(PENDING):

THE FOLLOWING ALLEGATION, DATED 07/29/2020, IS PENDING AGAINST MOS SIMON:

■ [REDACTED]

Disclosure # 4:

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT.

PLAINTIFF	DOCKET	COURT	FILED	DISPOSED	DISPOSITION
Margaret Noel	15-CV-4096	E.D.N.Y.	7-13-15	2-22-16	Settlement, without admission of fault or liability
Joenald Pierre	14-CV-7391	E.D.N.Y.	12-19-14	10-25-16	Settlement, without admission of fault or liability
Jean Dargout	08-CV-3268	E.D.N.Y.	8-12-08	12-23-08	Settlement, without admission of fault or liability

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:

Disclosure # 5:

CCRB CASE: 200401855

REPORT DATE: 03/02/2004

[REDACTED]
[REDACTED]
■ [REDACTED]

Disclosure # 6:

CCRB CASE: 201011605

REPORT DATE: 08/21/2010

[REDACTED]
[REDACTED]
■ [REDACTED]

Eric Gonzalez
District Attorney
Kings County